



California Regional Water Quality Control Board

Santa Ana Region



Terry Tamminen
Secretary for
Environmental
Protection

Internet Address: <http://www.swrcb.ca.gov/rwqcb8>
3737 Main Street, Suite 500, Riverside, California 92501-3348
Phone (909) 782-4130 - FAX (909) 781-6288

Arnold Schwarzenegger
Governor

April 9, 2004

Mr. Ken A. Miller, P.E.
Director of Public Works
County of San Bernardino
Department of Public Works – Flood Control District
825 East Third Street
San Bernardino, CA 92415-0835

COMMENTS ON THE MARCH 24, 2004 MODEL WATER QUALITY MANAGEMENT PLAN GUIDANCE FOR SAN BERNARDINO COUNTY AND THE INCORPORATED CITIES OF SAN BERNARDINO COUNTY WITHIN THE SANTA ANA WATERSHED

Dear Mr. Miller:

We completed our review of the revised Model Water Quality Management Plan Guidance submitted to us on March 24, 2004. This revised document is a significant improvement from the initial submittal. We have the following comments:

1. Projects requiring WQMP, page 1-2. Section 1.2 – Please revise or clarify the scope of non-category projects. This scope should not be less than that specified in the New Development and Redevelopment Guidelines, dated June 2000 and the Report of Waste Discharge, September 2000.
2. Identify Pollutants of Concern, page 2-2 – Section 2.2 should also address identification of pollutants that are discharging to receiving waters that are not on the 303(d) list.
3. Hydrologic Conditions of Concern, page 2-5, Section 2.3.2.A – We do not agree with the inclusion of channel reaches that have been fully and properly approved for hardening but not yet constructed in the definition of engineered, hardened channels, and regularly maintained channels. Please delete the second sentence.

Explain use of 1,2, and 5-year frequency storm events, otherwise, please use OC Model.

4. Source Control BMPs, page 2-13 – Please define use of or delete the term “infeasible” with respect to required source control BMPs. The permit allows options for technical infeasibility of treatment controls. Its use anywhere else should be clarified or deleted.

California Environmental Protection Agency

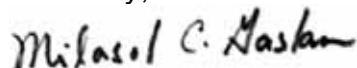


5. Street Sweeping Private Streets and Parking Lots, page 2-14 – The principal permittee's response to review of the Report of Waste Discharge, letter dated December 2000 included a commitment to sweep residential zones at least twice each permit year with at least one sweeping during the pre-rainy season of September-October. We suggest a similar requirement for developments with POAs and privately owned streets and parking lots.
6. Treatment Control BMPs, Section 2.5.3, page 2-20 – Please include a section on selection of treatment control BMPs. This section should provide instructions on the selection of a single treatment BMP or combination based on identified pollutants of concern discharging to an impaired water body, receiving water that is not on the 303(d) list as well as other pollutants of concern other than those listed as causing impairment.
7. Determining Flow Treatments, Page 2-30, first paragraph - Please direct project proponents to also include those conditions referenced with "Caution" in Table 2-5 to use the unit hydrograph method to calculate the BMP design flow.
8. WQMP Template, page A-4 - Delete category 9. Define in parenthesis the last category as a non-category project.
9. Section 3 (Page A-12) - Remove the bullets from the yes and no boxes in the parking area designs section.
10. Template Pagination - Following page A-13, the pages are again numbered A-1 through A-8, instead of continuing with page A-14.

These comments, along with all other comments received, will also be posted on our website. To view or download a copy of the comments, please access our website at <http://www.swrcb.ca.gov/rwqcb8/html/sb-permittee.html>

If you have any questions, please call me at (909) 782-4419, Muhammad Bashir at (909) 320-6396, or Mary Bartholomew at (909) 321-4586.

Sincerely,



Milasol Gaslan, Chief
Inland Storm Water Unit

Cc: San Bernardino County Co-permittees
NRDC – David Beckman/Dan Gildor
Orange County Coastkeeper – Garry Brown
Defend the Bay – Bob Caustin
Construction Industry Coalition on Water Quality – Tim Piasky
WSPA – Steven Arita
Richard R. Horner

California Environmental Protection Agency



Recycled Paper